PRESTON EASLEY, ESQ./Cal State Bar No. 108347 LAW OFFICES OF PRESTON EASLEY 2500 Via Cabrillo Marina, Suite 106 San Pedro, California 90731-7724

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ATTORNEY FOR: Plaintiff

BERT MEYER

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF HAWAII

)	Civil No.: CV 04 00049 HG-BMK
)	(In Admiralty)
)	PLAINTIFF'S FIRST AMENDED
)	RESPONSE TO INTERROGATORY
)	NO. 11
)	
)	
)	
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11. Describe accurately and fully in your own words exactly what occurred in the ten minutes prior to the occurrence, what occurred during the occurrence, and what occurred during the ten minutes after the occurrence including anything said by you or to you.

RESPONSE TO NO. 11:

I was unlocking a cone with a pole between rows 15 and 16. My right foot was on the catwalk and my left foot was on a padeye on the hatch lid. My left foot slipped and I lost my balance and fell. My left leg went into the gap between the catwalk and the inshore side of the

hatch lid and I was stuck. I was yelling for help for awhile, then Dan Farney helped me get out of the gap.

Dated: September 13, 2004

PRESTON EASLEY Attorney for Plaintiff BERT MEYER

VERIFICATION

STATE OF HAWAII)	SS.	
TTY & COUNTY OF HONOLULU)		
I am the Plaintiff			
in the above entitled action or proceeding; I ha	ave read t	the foregoing <u>P</u>	<u>laintiff's Fir</u> s
Amended Response to Interre	ogatory	NO. 11	
and know the contents thereof; and I certify the	nat the sai	me is true of my	own knowledge,
except as to those matters which are therein st	tated upo	n my informatio	n or belief, and as
to those matters I believe it to be true.			
	· · · · · · · · · · · · · · · · · · ·	······································	· ·
I declare, under penalty of perjury, that the fo	regoing i	s true and correc	rt.
Executed on Sept. 27, 2004 at (date)	Honolu (place		, Hawaii
· :	<u>J</u>	Signature Meyer	<i>y</i> —

PRESTON EASLEY, ESQ./Cal. State Bar No.: 108347

LAW OFFICES OF PRESTON EASLEY

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UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

BERT MEYER,)
Plaintiff,	Civil No.: CV 03-00696 SOM-BMK (In Admiralty)
v. MATSON NAVIGATION COMPANY, INC.,	CERTIFICATE OF SERVICE RE PLAINTIFF'S FIRST AMENDED RESPONSE TO INTERROGATORY NO. 11
Defendant.))-)

CERTIFICATE OF SERVICE RE PLAINTIFF'S FIRST AMENDED RESPONSE TO INTERROGATORY NO. 11

I hereby certify that on this date copies of PLAINTIFF'S FIRST AMENDED RESPONSE TO INTERROGATORY NO. 11 were duly served upon the following in the manner indicated below, addressed as follows:

	<u>Mailed</u>	<u>Delivered</u>	Via Facsimile
John R. Lacy, Esq. GOODSILL ANDERSON QUINN & STIFEL Alii Place, Suite 1800 1099 Alakea Street Honolulu, HI 96813	X		
Attorneys for Defendants MATSON NAVIGATION COMPANY, INC.; MATSON TERMINALS, INC.	X		
Capt. Robert Riley 10 Arguello Circle San Rafael, CA 94901			
Kammy Kalili P.O. Box 186 Hauula, HI 96717	×		
Dated: September 27, 2004		By <u>fatti Ba</u> Patti Bannon	m